

## **REMARKS/ARGUMENTS**

### **1.) Claim Amendments**

The Applicant has amended claims 40 and 45. Applicant respectfully submits no new matter has been added. Accordingly, claims 28-54 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

### **2.) Claim Rejections – 35 U.S.C. § 112**

The Examiner rejected Claims 40, 45 and 48 under 35 U.S.C. § 112 because there is insufficient antecedent basis for the limitation of the claims. The Applicant has amended claims 40 and 45 to overcome the rejections. The Examiner's consideration of the amended claims is respectfully requested.

### **3.) Claim Rejections – 35 U.S.C. § 103 (a)**

Claims 28-32, 34-35, 39, 46-47, and 53 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lalitha (US 20030112791) in view of Kreda, *et al.* (US 6816578). The Applicant respectfully traverses the Examiner's rejections and submits the following remarks for the Examiner's favorable reconsideration.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. **Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations (MPEP 2143).** In that regard, the Applicant respectfully submits that the Examiner's two references still fail to teach or suggest each and every element of the presently pending independent claims.

The present invention discloses and claims a system for allowing multi-modal access of content. The system includes a dual mode mobile station, a proxy server having an enhanced functionality for supporting voice browsing, and a telephony platform having an Automatic Speech Recognizer (ASR) to convert text messages to

speech. The proxy server recognizes and extracts key elements in the original web content to trigger voice browsing. The web content can then be accessed by voice commands without requiring conversion of the web content. A primary object of the present invention is provide voice browsing without requiring the content to be converted, such as Voice XML (see page 4, lines 19-29 of the Applicant's specification).

Lalitha discloses a mobile station that transmits a request to a Platform for Privacy Preferences (P3P) Web site for an XML version of the site's privacy policy. If the mobile station's user preferences are set to audio, the mobile station transmits a request to the Web site for the natural language version of the privacy policy in audio format. The Web site then responses with the audio version of the privacy policy (see Abstract of Lalitha).

The Examiner stated that Lalitha discloses voice browsing, such that arbitrary web content can be accessed by voice commands without requiring conversion of the web content. The Applicant respectfully disagrees with this characterization. Lalitha requires the conversion of the web content into an audio format, such as Voice XML (see paragraph 0062 of Lalitha). Further discloses the use of VXML gateway to convert or read the web content (see paragraphs 0076 and 0077 of Lalitha). In contrast to the Applicant's invention, Lalitha requires the conversion of the web content to an audio version.

Furthermore, Lalitha does not disclose that the proxy server recognizes/extracts key elements, using predefined rules, to trigger voice browsing, such that arbitrary web content can be accessed by voice commands. Specifically, Lalitha version of "voice browsing" does not enable the actual browsing of the Web site. Rather, Lalitha merely discloses verbally retrieving a policy and allowing the verbal acceptance or rejection of the policy (see paragraph 0096 of Lalitha).

In addition, Kredo does not make up the missing elements. Kredo teaches speech recognition and the recognition of predefined words and phrases. Kredo does not teach or suggest using voice commands to perform actual voice browsing of a Web site.

Therefore, the Applicant respectfully submits that the combination of Lalitha and Kredo do not teach or suggest all the elements as recited in claim 28. Claim 53 recites limitations analogous to claim 28 and also are not taught or suggested in Lalitha and Kredo. Claims 29-32, 34, 35, 39, and 46-47 depend from amended claim 28 and recite further limitations in combination with the novel elements of claim 28. Therefore, the allowance of claims 28-32, 34, 35, 39, 46, 47, and 53 is respectfully requested.

Claims 33, 37-38 and 43 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lalitha (US 20030112791) in view of Kredo, *et al.* (US 6816578) and further in view of Rhie, *et al.* (US 5953392). The Applicant respectfully traverses the Examiner's rejections and submits the following remarks for the Examiner's favorable reconsideration.

Lalitha requires the conversion of the web content into an audio format, such as Voice XML. Furthermore, Lalitha discloses the use of VXML gateway to convert or read the web content. Lalitha requires the conversion of the web content to an audio version. In addition, Lalitha does not disclose that the proxy server recognizes/extracts key elements, using predefined rules, to trigger voice browsing, such that arbitrary web content can be accessed by voice commands. Lalitha's version of "voice browsing" does not enable the actual browsing of the Web site. Rather, Lalitha merely discloses verbally retrieving a policy and allowing the verbal acceptance or rejection of the policy (see paragraph 0096 of Lalitha).

Kredo does not make up the missing elements. Kredo teaches speech recognition and the recognition of predefined words and phrases. Kredo does not teach or suggest using voice commands to perform actual voice browsing of a Web site.

The addition of Rhie also does not make up the missing elements. Therefore, the combination of Lalitha, Kredo and Rhie do not teach or suggest the Applicant's invention as recited in claim 28. Claims 33, 37-38 and 43 depend from amended claim 28 and recite further limitations in combination with the novel elements of claim 28. Therefore, the allowance of claims 33, 37-38 and 43 is respectfully requested.

Claim 36 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Lalitha (US 20030112791) in view of Kredo, *et al.* (US 6816578) and further in view of

Groner (US 6507643). The Applicant respectfully traverses the Examiner's rejection and submits the following remarks for the Examiner's favorable reconsideration.

Lalitha requires the conversion of the web content into an audio format, such as Voice XML. Lalitha also does not disclose that the proxy server recognizes/extracts key elements, using predefined rules, to trigger voice browsing, such that arbitrary web content can be accessed by voice commands. Lalitha's version of "voice browsing" does not enable the actual browsing of the Web site. Lalitha merely discloses verbally retrieving a policy, and allowing the verbal acceptance or rejection of the policy.

Kredo and Groner do not make up the missing elements. Therefore, the combination of Lalitha, Kredo and Groner do not teach or suggest the Applicant's invention as recited in claim 28. Claim 36 depends from amended claim 28 and recites further limitations in combination with the novel elements of claim 28. Therefore, the allowance of claim 36 is respectfully requested.

Claims 40-42, 44-45, 48-52 and 54 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lalitha (US 20030112791) in view of Kredo, *et al.* (US 6816578) and further in view of Gong, *et al.* (US 7177814). The Applicant respectfully traverses the Examiner's rejections and submits the following remarks for the Examiner's favorable reconsideration.

In regards to claim 28, Lalitha requires the conversion of the web content into an audio format, such as Voice XML. Further discloses the use of VXML gateway to convert or read the web content. In addition, Lalitha does not disclose that the proxy server recognizes/extracts key elements, using predefined rules, to trigger voice browsing, such that arbitrary web content can be accessed by voice commands. Lalitha's version of "voice browsing" does not enable the actual browsing of the Web site. Rather, Lalitha merely discloses verbally retrieving a policy, and allowing the verbal acceptance or rejection of the policy (see paragraph 0096 of Lalitha).

Kredo and Gong do not make up the missing elements. Neither, Kredo nor Gong teach or suggest using voice commands to perform actual voice browsing of a Web site. Therefore, the combination of Lalitha, Kredo and Gong do not teach or suggest the Applicant's invention as recited in claim 28.

In regards to claim 54, Lalitha, Kredo and Gong do not teach or suggest matching, in the enhanced proxy server, keywords recognized in a user voice command with predefined and selected keywords to establish which link to use for sending a get request to the relevant application service provider and processing and pushing the content received from the application service provider to the user agent.

Therefore, the combination of Lalitha, Kredo and Gong do not teach or suggest all the elements recited in claims 28 and 54. Claims 40-42, 44, 45, and 48-52 depend from amended claim 28 and recite further limitations in combination with the novel elements of claim 28. Therefore, the allowance of claims 40-42, 44-45, 48-52 and 54 is respectfully requested.

### **CONCLUSION**

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

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